



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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AJE  
F. #2022R00135

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 1, 2023

By ECF

The Honorable Hector Gonzalez  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Kate Spencer, et al.  
Criminal Docket No. 23-145 (HG)

Dear Judge Gonzalez:

The government respectfully writes to request that a proposed stipulation concerning discovery materials that contain personally identifiable information regarding individuals other than the defendant (“PII”) be so ordered by the Court. The government makes this application because there is a significant amount of discovery materials to be produced to the defendants that contain PII and it believes that the proposed stipulation will enable expedited production of those materials. The proposed stipulation and order, which has been signed by all parties, is respectfully enclosed for the Court’s consideration.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: \_\_\_\_\_/s/  
Andrew Estes  
Trial Attorney  
(718) 254-6250

cc: All Counsel of Record (By Email and ECF)